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February 22, 2023

By ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Special Associate Counsel in the Special Federal Litigation Division of the New York City Law Department, and one of the attorneys assigned to the defense of the above-referenced matter. Defendants write to provide three documents to the Court for *in camera* review pursuant to the February 13, 2023 Court Conference.

Based on the Court's direction, Defendants have produced all documents except one and redacted portions of five other documents on the basis of the deliberative process privilege.¹ After further review, three of the five redacted documents (DMNL00303_000043171, DMNL00303_000152238, and DMNL00303_000177041) will be produced unredacted to the Plaintiffs. The substance contained in these three documents is duplicative of other documents that were fully produced to Plaintiffs pursuant to the February 13th Court Conference. The three documents being provided to the Court for *in camera* review consists of the two other redacted documents (DMNL00303_000186826 and DMNL00303_000252160) and one document

¹ For ease of reference, Defendants refer to the six documents in this letter by their control number, but can be located in Defendants' production at the following Bates Numbers: DEF-E_000058519, DEF-E_00005841, DEF-E_000058569, DEF-E_000058487, DEF-E_000058498, and DEF-E_000058500.

(DMNL00303_000257370) fully withheld on the bases of both the deliberative process privilege and the law enforcement privilege.

Thank you for your time and attention to this matter.

Respectfully submitted,

Peter Scutero /s_____

Peter Scutero
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cc: ALL COUNSEL (via ECF)